

UNITED STATES DISTRICT COURT  
For The  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 1:25-CV-10468-IT

TOMMY GIGUERE,  
Petitioner

v.

STACY TARDIF,  
Respondent

**JOINT STATEMENT**

Now come the Parties, pursuant to Local Rule 16.1(d), by their undersigned counsel, and file herewith their Joint Statement regarding proposed pretrial schedule:

1. Settlement Proposals: The Parties hereby certify that Plaintiff, Tommy Giguere (“Father”) did make a written settlement proposal within the timeline specified by the rules. The Parties further certify that Defendant, Stacy Tardif (“Mother”) did respond in writing to Father’s settlement proposal. The Parties remain far apart and do not believe alternative dispute resolution options would bring them any closer to resolution.

2. Discovery Plan: Whereas this matter is pending pursuant to the Hague Convention on Civil Aspects of International Child Abduction (“Hague Convention”) which requires an expedited timeline for resolution, and if not resolved within six weeks of filing, the Central Authority has the right to make inquiry as to the reasons for failure to resolve the matter (Hague Convention Article 11). Accordingly, the parties agree on an expedited discovery deadline of 30 days from the date of the scheduling conference meaning discovery closes

June 13, 2025. This expedited discovery deadline shall include all discovery for both fact based and experts, if any.

3. Dispositive Motions: Thereafter, if either party intends to file a dispositive motion, notice should be given to the other party within one week of the close of evidence of such intent and such dispositive motions shall be filed by June 30, 2025, with oppositions being filed by July 8, 2025. If neither party intends to file a dispositive motion with the court, the matter should be scheduled for a trial conference forthwith followed by a trial on the merits. The Parties seek a trial in July, 2025.

4. Magistrate Judge: The Parties have considered the option of using a magistrate judge for all purposes and do not agree to trial by magistrate judge.

5. Discovery Budget: Father anticipates spending no more than \$10,000 on discovery. Mother anticipates spending no more than \$5,000 on discovery.

6. ADR Certification: Both counsel have spoken with their respective clients, advised them of the ADR options available and spoken with each other. Neither Party wishes to opt in to any ADR process given the circumstances of this case including, but not limited to their limited financial resources and their desire for an expeditious resolution of this Hague Convention case.

Respectfully submitted,

**TOMMY GIGUERE,**

By his attorneys,

**BRICK, JONES, MCBRIEN, & HICKEY, LLP**

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May 9, 2025

**STACY TARDIF,**

By her attorneys,

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## eSignature Details

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